

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: : Chapter 11  
Center City Healthcare, LLC d/b/a Hahnemann University :  
Hospital, *et al.*, : Case No. 19-11466 (MFW)  
Debtors. : Jointly Administered  
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Center City Healthcare, LLC d/b/a Hahnemann University :  
Hospital, Philadelphia Academic Health System, LLC, St. :  
Christopher's Healthcare, LLC, Philadelphia Academic :  
Medical Associates, LLC, HPS of PA, L.L.C., SCHC :  
Pediatric Associates, L.L.C., St. Christopher's Pediatric :  
Urgent Care Center, L.L.C., SCHC Pediatric Anesthesia :  
Associates, L.L.C., StChris Care at Northeast Pediatrics, :  
L.L.C., TPS of PA, L.L.C., TPS II of PA, L.L.C., TPS III :  
of PA, L.L.C., TPS IV of PA, L.L.C. and TPS V of PA, :  
L.L.C.,  
Plaintiffs, :  
v. : Adv. Proceeding No. 21-50912 (MFW)  
HRE Capital, LLC f/k/a Healthcare Real Estate Capital, :  
LLC, :  
Defendant. :  
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**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING  
STIPULATION EXTENDING TIME FOR HRE CAPITAL, LLC F/K/A  
HEALTHCARE REAL ESTATE CAPITAL, LLC TO RESPOND TO THE COMPLAINT**

I, Mark Minuti, counsel for the above-captioned plaintiffs (collectively, the "Plaintiffs") in the above-captioned adversary proceeding (the "Adversary Proceeding"), hereby certify as follows:

1. On June 24, 2021, the Plaintiffs commenced the Adversary Proceeding by filing the *Complaint for Avoidance and Recovery of Fraudulent Transfer Pursuant to 11 U.S.C. §§ 548 & 550* [Adv. D.I. 1] against HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC (the "Defendant" and together with the Plaintiffs, the "Parties"). The Adversary Proceeding asserts a claim for constructive fraudulent conveyance under 11 U.S.C. §§ 548 & 550.

2. Subsequent to the filing of the Complaint, the Parties have engaged in discussions related to the Complaint and have agreed, subject to approval of the Court, on an extension for the Defendant to file a motion or answer in response to the Complaint. The Parties' agreement is set forth in the *Stipulation Extending Time for HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC to Respond to the Complaint* attached as **Exhibit 1** to the proposed order attached hereto as **Exhibit A** (the "Proposed Order").

3. The form of the Proposed Order attached hereto as **Exhibit A** has been reviewed and approved by counsel for the Defendant.

4. Based on the foregoing, I respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

5. Of course, we are available to discuss this matter at the Court's convenience.

Respectfully submitted,

*/s/ Mark Minuti*  
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Mark Minuti (DE Bar No. 2659)  
**SAUL EWING ARNSTEIN & LEHR LLP**  
1201 N. Market Street, Suite 2300  
P.O. Box 1266  
Wilmington, DE 19899  
Telephone: (302) 421-6840  
mark.minuti@saul.com

*Counsel for the Plaintiffs*

Dated: September 27, 2021